	Case 4:20-cv-03664-YGR Document 6	353-6 Filed 08/04/22 Page 1 of 5		
1 2 3 4 5 6 7 8 9 10	UNITED STATE	ES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION			
12	TVORTILITY DISTRICT OF CA	ALII ORATI, OTALITAD DIVISION		
13	CHASOM BROWN, WILLIAM BYATT,	Case No. 4:20-cv-03664-YGR-SVK		
14	JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO,	[PROPOSED] ORDER GRANTING MOTION TO SEAL		
15	individually and on behalf of all similarly			
16	situated, Plaintiffs,	Judge: Hon. Susan van Keulen, USMJ		
17	V.			
18	GOOGLE LLC,			
19	Defendant.			
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		Case No. 4:20-cv-03664-YGR-SVK		

[PROPOSED] ORDER GRANTING MOTION TO SEAL

[PROPOSED] ORDER

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Before the Court is Administrative Motion to Seal Portions of Google LLC's Response to Plaintiffs' Renewed Request to Depose Google CEO Sundar Pichai (Dkt. 635) ("Response").

Having considered the Response and good cause having been found, the Court **ORDERS** as follows:

Text To Be Sealed

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Document Google LLC's Response to Plaintiffs' Renewed Request to Depose Google CEO Sundar Pichai (Dkt. 635)

GRANTED as to the portions at:

Pages 3:15-16, 3:24, 4:2

sealed contains Google's highly proprietary confidential and highly information regarding sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors alter their systems practices relating to competing products. It may also place Google at an increased risk of cybersecurity

Basis for Sealing Portion of Document

The information requested to be

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Exhibit 2

Excerpts

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5/6/22 Twohill Depo Tr.

127:8

GRANTED as to the portions at: Pages 7:11, 126:2-3, 126:7, 126:10-16, 127:6,

to competing products. The information requested to be sealed contains Google's highly confidential and proprietary highly information regarding sensitive features of Google's

threats, as third parties may seek to

use the information to compromise Google's internal practices relating

internal systems and operations,

1			including various types of Google's
2			internal projects and proposals, and
			their proprietary functionalities, as well as internal metrics, that Google
3			maintains as confidential in the
4			ordinary course of its business and
			is not generally known to the public
5			or Google's competitors. Such
6			confidential and proprietary information reveals Google's
			internal strategies, system designs,
7			and business practices for operating
8			and maintaining many of its
			important services, and falls within
9			the protected scope of the Protective Order entered in this action. See
10			Dkt. 81 at 2-3. Public disclosure of
11			such confidential and proprietary
11			information could affect Google's
12			competitive standing as competitors
13			may alter their systems and practices relating to competing
			products. It may also place Google
14			at an increased risk of cybersecurity
15			threats, as third parties may seek to
1.0			use the information to compromise
16			Google's internal practices relating to competing products.
17	Exhibit 3	GRANTED as to the	The information requested to be
18	2/18/22 McClelland Depo Tr.	portions at:	sealed contains Google's highly
	Excerpts	D 20.16.20.20.2.11	confidential and proprietary
19		Pages 28:16-20, 29:3-11, 29:14-17, 30:5, 106:10-	information regarding highly sensitive features of Google's
20		13, 107:3, 107:5-15,	internal systems and operations,
		107:18-19, 108:5-6,	including various types of Google's
21		113:4, 118:2, 118:7,	internal projects and proposals, and
22		118:12, 118:15-16, 118:23, 119:12-14	their proprietary functionalities, that Google maintains as
23			confidential in the ordinary course
24			of its business and is not generally known to the public or Google's
			competitors. Such confidential and
25			proprietary information reveals
26			Google's internal strategies, system
			designs, and business practices for
27			operating and maintaining many of its important services, and falls
28			within the protected scope of the

1			Protective Order entered in this
2			action. See Dkt. 81 at 2-3. Public
			disclosure of such confidential and proprietary information could affect
3			Google's competitive standing as
4			competitors may alter their systems
			and practices relating to competing
5			products. It may also place Google
6			at an increased risk of cybersecurity threats, as third parties may seek to
7			use the information to compromise
/			Google's internal practices relating
8	7.111.2	CD A VITTED	to competing products.
9	Exhibit 5 11/19/21 Adhya Depo Tr.	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly
	Excerpts Excerpts	portions at.	confidential and proprietary
10	F	Pages 7:17	information regarding highly
11			sensitive features of Google's
10			internal systems and operations,
12			including Google's internal project name, that Google maintains as
13			confidential in the ordinary course
14			of its business and is not generally
14			known to the public or Google's
15			competitors. Such confidential and proprietary information reveals
16			Google's internal strategies, system
			designs, and business practices for
17			operating and maintaining many of
18			its important services, and falls
19			within the protected scope of the Protective Order entered in this
19			action. See Dkt. 81 at 2-3. Public
20			disclosure of such confidential and
21			proprietary information could affect
			Google's competitive standing as competitors may alter their systems
22			and practices relating to competing
23			products. It may also place Google
24			at an increased risk of cybersecurity
24			threats, as third parties may seek to use the information to compromise
25			Google's internal practices relating
26			to competing products.
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SO ORDERED.

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